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Attorneys for Defendant U.S. Bank National Association and ChexSystems, Inc.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ROOTA SHIRINYANS,

11 Plaintiff,

12 vs.

13 BANK OF AMERICA, N.A., U.S. BANK,
14 N.A., CHEXSYSTEMS, INC., EARLY
15 WARNING SERVICES, LLC,

16 Defendants.

Case No.: 2:25-cv-00411-GMN-EJY

**JOINT MOTION TO EXTEND TIME
FOR U.S. BANK, N.A. AND
CHEXSYSTEMS, INC. TO FILE
RESPONSE TO COMPLAINT**

[FIRST REQUEST]

17 Pursuant to Local Rule 7-1 and Local Rule 6-1, Plaintiff Roota Shirinyans (“Plaintiff”)
18 and Defendants U.S. Bank National Association (“U.S. Bank”) and ChexSystems, Inc.
19 (“ChexSystems”) (together, “Defendants”), by and through their respective undersigned counsel
20 of record, submit this Joint Motion and Proposed Order.

21 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants
22 that the time for Defendants to respond to the Complaint in this action is extended to and through
23 May 1, 2025. This is the Parties’ first request for an extension of this deadline.

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1 The Parties request this extension to permit Defendants to review the allegations and for
2 the Parties to discuss a possible early resolution of this case to avoid unnecessary fees and costs.

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4 DATED this 2nd day of April, 2025.

DATED this 2nd day of April, 2025.

5
6 /s/ Kevin L. Hernandez

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11 *Attorneys for Defendant U.S. Bank National*
12 *Association and ChexSystems, Inc.*

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16 **ORDER**

17 **IT IS SO ORDERED.**

18 
19 UNITED STATES MAGISTRATE JUDGE

20 Dated: April 2, 2025